

LAW OFFICES OF JAE Y. KIM, LLC  
One University Plaza, Suite 212  
Hackensack, New Jersey 07601  
Attorney ID:04451995  
Tel: (201) 488-8600  
Fax: (201) 488-8633  
E-mail: jkim@jyklaw.com  
Attorneys for creditor  
JR Arts And Crafts Co., LTD

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

In re:

YONG SUCK LEE,

Debtor.

Case No: 18-11532 (VFP)

Chapter 13

**CREDITOR'S OBJECTION TO CONFIRMATION OF DEBTOR'S PLAN**

JR Arts And Crafts Co., LTD ("JR Arts"), by and through its attorneys, the Law Offices of Jae Y. Kim, LLC (Jae Y. Kim, Esq. appearing), by way of objection to confirmation of the Debtor's proposed Chapter 13 Plan respectfully objects as follows:

1. Pursuant to a 2017 New York State Court litigation case, *JR Arts is a claimant against the debtor; JR Arts And Crafts Co., LTD vs. Natasha Accessories LTD., Qualiti, Inc., Ravie Singh aka Gokaran Singh, Andy Yong Jin Lee and Robert Yong Suck Lee*, Index Number 654618/2017 (the "State Court Litigation"). The complaint in the State Court Litigation was filed on or about August 23, 2017.

2. On or about December 8, 2017, the debtor herein filed a general denial Answer to the State Court Litigation

through the Law Offices of Shawn J. Wallach, PC of New York, New York.

3. On January 25, 2018, the debtor filed the within Chapter 13 case. However, at no time and notwithstanding the State Court Litigation, JR Arts was not named as a creditor on the debtor's schedules or creditor's matrix. As such, at no time did JR Arts receive notice of the debtor's bankruptcy filing. State Court Litigation counsel has not forwarded notice of the bankruptcy filing to JR Arts' State Court Litigation counsel either.

4. JR Arts only recently became aware of this bankruptcy filing after taking on an independent search following rumors of the debtor's bankruptcy filing in the business community.

5. Currently, JR Arts is in the process of preparing a Motion to, *inter alia*, File a Proof of Claim Out Of Time.

WEHEREFORE, JR Arts respectfully request that confirmation of the debtor's Chapter 13 plan be adjourned pending the final outcome of its Motion.

Date: August 1, 2018

/s/ Jae Y. Kim  
Jae Y. Kim